

THE HONORABLE JAMES L. ROBERT

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA
GARRETT, ROBERT NIXON,
SAMANTHA NIXON, DAVID
BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN,
ROGELIO VARGAS, MARILYN DEWEY,
PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

**STIPULATION BETWEEN PLAINTIFFS
AND DEFENDANT HAPPY HOUR MEDIA
GROUP, LLC
AND
~~PROPOSED~~ ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S
MOTION TO DISMISS**

Noted: October 31, 2023.

STIPULATION BETWEEN PLAINTIFFS AND HAPPY
HOUR AND [PROPOSED] ORDER AMENDING
DEADLINES RELATED TO HAPPY HOUR'S MOTION
TO DISMISS – PAGE 1
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1 WHEREAS, Happy Hour has filed a motion to dismiss the Complaint (Dkt. 32), which is
2 noted for consideration on November 10, 2023,

3 WHEREAS, by stipulated order (Dkt. 24), the Opposition to Happy Hour's motion to
4 dismiss is due on November 2 and the reply is due on November 10, 2023,

5 WHEREAS, on October 26, 2023, Plaintiffs moved to amend their complaint with a noted
6 hearing date of November 17, 2023 (Dkt. 40),

7 WHEREAS, under the present schedule, the Plaintiffs and Happy Hour would complete
8 the briefing on the motion to dismiss before knowing whether and to what extent the Complaint
9 will be amended,

10 WHEREAS, having the Court consider the motion to dismiss before it decides the motion
11 to amend could lead to a need to renew or alter the motion to dismiss or otherwise use judicial time
12 inefficiently or create confusion,

13 WHEREAS, the Plaintiffs and Happy Hour have met and conferred in an attempt to
14 promote efficiency,

15 THEREFORE, Plaintiffs and Happy Hour stipulate that:

- 16
- 17 1. Happy Hour may withdraw its pending motion to dismiss without prejudice to Happy
18 Hour's right to re-file the motion to dismiss or to file an amended motion to dismiss;
19 and
20
 - 21 2. The deadline for Happy Hour to file its motion to dismiss will be the first Thursday that
22 is not fewer than ten court days after the Court denies the pending motion for leave to
23 amend the complaint or the Plaintiffs file their first amended complaint after being
24 given leave to do so.
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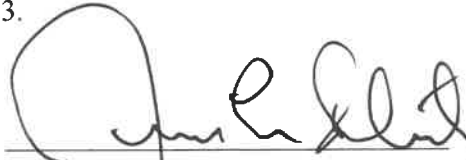
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JLR

~~PROPOSED~~ ORDER

IT IS SO ORDERED.

DATED this 31ST day of Oct., 2023.


The Honorable James L. Robart
United States District Judge